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*Attorneys for Plaintiff, Deutsche Bank National Trust Company, as Indenture Trustee for American Home Mortgage Investment Trust 2007-1*

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

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11 DEUTSCHE BANK NATIONAL TRUST  
12 COMPANY, AS INDENTURE TRUSTEE  
13 FOR AMERICAN HOME MORTGAGE  
INVESTMENT TRUST 2007-1,

14 Plaintiff,

15 vs.

16 OLD REPUBLIC TITLE INSURANCE  
17 GROUP, INC.; OLD REPUBLIC NATIONAL  
18 TITLE INSURANCE COMPANY;  
19 FOUNDERS TITLE COMPANY OF  
NEVADA; DOE INDIVIDUALS I through X;  
and ROE CORPORATIONS XI through XX,  
inclusive,

20 Defendants.  
21

Case No.: 3:20-cv-00535-MMD-CLB

**STIPULATION AND ORDER TO  
EXTEND TIME PERIOD TO RESPOND  
TO MOTIONS TO DISMISS [ECF Nos.  
12 & 13]**

**[First Request]**

22 COMES NOW Plaintiff Deutsche Bank National Trust Company, as Indenture Trustee  
23 for American Home Mortgage Investment Trust 2007-1 (“Deutsche Bank”); Defendant Old  
24 Republic National Title Insurance Company (“ORNTIC”) and Specially-Appearing Defendant  
25 Old Republic Title Insurance Group, Inc. (“ORTIG”) (collectively, the “Parties”), by and  
26 through their counsel of record, hereby stipulate and agree as follows:

- 27 1. On September 10, 2020, Deutsche Bank filed its Complaint in Second Judicial  
28 District Court, Case No. CV20-01413 [ECF No. 1-1];

2. On September 22, 2020, ORNTIC filed a Petition for Removal to this Court [ECF No. 1];
3. On October 30, 2020, ORTIG filed a Motion to Dismiss [ECF No. 12];
4. On November 3, 2020, ORNTIC also filed a Motion to Dismiss [ECF No. 13]
5. Deutsche Bank's deadline to respond to ORTIG's Motion to Dismiss is currently November 13, 2020;
6. Deutsche Bank's deadline to respond to ORNTIC's Motion to Dismiss is currently November 17, 2020;
7. Deutsche Bank's counsel is requesting an extension until Tuesday, December 1, 2020, to file its responses to the pending Motions to Dismiss;
8. This extension is requested to allow counsel for Deutsche Bank additional time to review and respond to the points and authorities cited to in the pending Motions;

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9. Counsel for ORTIG and ORNTIC does not oppose the requested extension;

10. This is the first request for an extension which is made in good faith and not for purposes of delay.

**IT IS SO STIPULATED.**

DATED this 10<sup>th</sup> day of November, 2020.

WRIGHT, FINLAY & ZAK, LLP

/s/ Lindsay D. Robbins

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*Attorneys for Plaintiff, Deutsche Bank National Trust Company, as Indenture Trustee for American Home Mortgage Investment Trust 2007-1*

DATED this 10<sup>th</sup> day of November, 2020.

EARLY SULLIVAN WRIGHT GIZER & McRAE LLP

/s/ Sophia S. Lau

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*Attorneys for Defendant, Old Republic National Title Insurance Company and Old Republic Title Insurance Group, Inc.*

**IT IS SO ORDERED.**

Dated this 1st day of December, 2020.



UNITED STATES DISTRICT JUDGE